CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-5, WT Docket No. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Tina Wieber
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	twieber@4wbi.net
	Form Type	54.313 and 54.422

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<110>	Has your company received its ETC certification from the FCC?	(yes / no) ○ ◉
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) ○ ○

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

310735mi112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<210> For the prior calendar year, were there any reportable voice service outages? No

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

(300) Unfulfilled Service Request
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	316735
<015>	Study Area Name	[redacted]STPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9595875003 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber04wbi.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	31[illegible]735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tim Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	310735mi510.pdf

(600) Functionality in Emergency Situations
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310[illegible]
<015>	Study Area Name	[illegible]ALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Kieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	8595875069 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tkieber@4wbi.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	310735mi610.pdf

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	22.82

<703>

<a1> State	<a2> Exchange (ILEC)	<a3> SAC (CETC)	<b1> Rate Type	<b2> Residential Local Service Rate	<b3> State Subscriber Line Charge	<b4> State Universal Service Fee	<b5> Mandatory Extended Area Service Charge	<c> Total per line Rates and Fees
				-- See attached worksheet				

(710) Broadbrand Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twicber@4wbi.net

<711>

<a1> State	<a2> Exchange (ILEC)	<b1> Residential Rate	<b2> State Regulated Fees	<c> Total Rate and Fees	<d1> Broadband Service - Download Speed (Mbps)	<d2> Broadband Service - Upload Speed (Mbps)	<d3> Usage Allowance (GB)	<d4> Usage Allowance Action Taken When Limit Reached {*select*}
			-- See attached worksheet --					

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<810>	Reporting Carrier	Westphalia Telephone Co
<811>	Holding Company	Clinton County Telephone Company
<812>	Operating Company	n/a

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
-- See attached worksheet --		

(900) Tribal Lands Reporting Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

		Select Yes or No or Not Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

(1000) Voice and Broadband Service Rate Comparability Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<1000> Voice services rate comparability certification: Yes

<1010> Attach detailed description for voice services rate comparability compliance: 310735mi1010.pdf

Name of Attached Document

<1020> Broadband comparability certification: Yes - Pricing is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support

<1030> Attach detailed description for broadband comparability compliance:

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).	

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP http://telecommich.org/lifeline/

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☑

<1222> Details on the number of minutes provided as part of the plan, ☑

<1223> Additional charges for toll calls, and rates for each such plan. ☑

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support

<2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support

<2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A> Round 2 Recipient of Incremental Support?

<2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.

Name of Attached Document Listing Required Information

<2025A> Round 1 or Round 2 Recipient of Incremental Support?

<2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-

Name of Attached Document Listing Required Information

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

(2000) Price Cap Carrier Additional Documentation (Continued)
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2015.

Name of Attached Document Listing Required Information

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

(3009)	Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	310735mi3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No) ◉ Yes ○ No	
(3014)	If yes, does your company file the RUS annual report	(Yes/No) ○ Yes ◉ No	
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	☐	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	☐	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No) ○ Yes ◉ No	
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	☐	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	☐	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	☐	
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	☑	
(3023)	Underlying information subjected to a review by an independent certified public accountant	☑	
(3024)	Underlying information subjected to an officer certification.	☑	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	☑	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	310735mi3026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

Financial Data Summary

(3027) Revenue	1049999
(3028) Operating Expenses	2507150
(3029) Net Income	-1485561
(3030) Telephone Plant In Service(TPIS)	4598606
(3031) Total Assets	2629473
(3032) Total Debt	1072741
(3033) Total Equity	1193251
(3034) Dividends	0

Name of Attached Document Listing Required Information

<010>	Study Area Code	370735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tara Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	[illegible] ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)
Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information _____

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information _____

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information _____

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: WESTPHALIA TEL CO

Signature of Authorized Officer: CERTIFIED ONLINE Date 07/01/2016

Printed name of Authorized Officer: John Summersett

Title or position of Authorized Officer: CEO

Telephone number of Authorized Officer: 9895875000 ext.

Study Area Code of Reporting Carrier: 310735 Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I certify that (Name of Agent)_____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.
Name of Authorized Agent:
Name of Reporting Carrier:
Signature of Authorized Officer: Date:
Printed name of Authorized Officer:
Title or position of Authorized Officer:
Telephone number of Authorized Officer:
Study Area Code of Reporting Carrier: Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.
Name of Reporting Carrier:
Name of Authorized Agent Firm:
Signature of Authorized Agent or Employee of Agent: Date:
Name of Authorized Agent Employee:
Title or position of Authorized Agent or Employee of Agent
Telephone number of Authorized Agent or Employee of Agent:
Study Area Code of Reporting Carrier: Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Attachments

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	22.82

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
MI	Westphalia		FR	22.82	0.0	0.0	0.0	22.82

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<711>

<a1> State	<a2> Exchange (ILEC)	<b1> Residential Rate	<b2> State Regulated Fees	<c> Total Rates and Fees	<d1> Broadband Service - Download Speed (Mbps)	<d2> Broadband Service -Upload Speed (Mbps)	<d3> Usage Allowance (GB)	<d4> Usage Allowance Action Taken When Limit Reached {select}
MI	Westphalia	34.95	0.0	34.95	5.0	1.0	250	Overage Charge
MI	Westphalia	39.95	0.0	39.95	10.0	1.0	250	Overage Charge
MI	Westphalia	40.0	0.0	40.0	20.0	1.0	250	Overage Charge

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	310735
<015>	Study Area Name	WESTPHALIA TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	9895875008 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twieber@4wbi.net

<810>	Reporting Carrier	Westphalia Telephone Co
<811>	Holding Company	Clinton County Telephone Company
<812>	Operating Company	n/a

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation
Westphalia Broadband Inc		Comlink

June 29, 2017
VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attention: Wireline Competition Bureau

Re: Petition for Limited Waiver of Section 54.313(j)
Westphalia Telephone Company.: 310735
ETC Annual Reports and Certifications; WC Docket Nos. 14-58 et al.

Dear Ms. Dortch:

Pursuant to Section 1.3 of the rules of the Federal Communications Commission ("FCC" or "Commission"), [1] Westphalia Telephone Company (the "Company"), SAC 310735, hereby requests a limited waiver of 47 C.F.R. Section 54.313(j). [2]As demonstrated in the following information, good cause exists for waiver. Specifically pursuant to 47 C.F.R Section 54.313(f)(2)(iii), All other privately held rate-of-return carriers must provide either: A copy of their financial statement which has been subject to review by an independent certified public accountant; or a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, with the underlying information subjected to a review by an independent certified public accountant and accompanied by an officer certification that: The carrier was not audited in the ordinary course of business for the preceding fiscal year; and that the reported data are accurate.

At this time, an audit of the Company's 2015 financial statement has not been reviewed by an independent certified public accountant. The review will be completed but not prior to that which is outlined in 47 C.F.R. Section 54.313(j). The Company estimates that completion of such financial statement will occur within 60 days of this waiver request. The Company will file financial statements with its original Form 481 filing and will revise such filing with USAC, the FCC, and the State Commission upon completion of the audit. In addition, once completed, all lines of Form 481 that are reliant on the financial statements will be revised if changes are made between the unaudited and audited financial statements.

Once the reviewed financial statements have been filed, the Company will be in full compliance with 47 C.F.R. Section 54.313(f)(2)(ii). Thus grant of this limited waiver is warranted. The "good cause" waiver standard has been satisfied, and grant of this waiver would be in the public interest.

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[1] 47 C.F.R. § 1.3
[2] 47 C.F.R. § 54.313(j)

Please address any correspondence regarding this transmittal to the attention of John Summersett at the following address, e-mail, and telephone number:

(989) 587-5000
john.summersett@glcestate.com
109 E. Main Street
PO BOX 368
Westphalia, MI 48894

Sincerely,

John Summersett
Westphalia Telephone Company

Westphalia Telephone Company
Line 112 Update

Progress Report – Five-Year Service Quality Plan – 47 C.F.R. § 54.313 (a)(1)
Westphalia Telephone Co (310735) submits its progress report on its five-year service quality plan pursuant to C.F.R. §54.313 (a)(1) that includes maps providing information regarding COMPANY's progress towards meeting its deployed targets, the amount of universal service received and is broken out separately by the amount spent on capital and operating expenses.

This progress report details how Westphalia Telephone Co continues to meet its broadband obligations within its service area, completes service requests within a reasonable amount of time and provides reliable state of the art telecommunications services within its study area that includes approximately 900 rural customers in one exchange. The projects listed within the progress report are designed to continue to provide improved service quality, improved service coverage, and improve service capacity within the wirecenter boundaries of Westphalia Telephone Co. In addition, this progress report provides sufficient data that details capital and operational expenditures, the amount of USF received allocated between capital and operational expenditures. All USF funds received and detailed within this progress report were used in accordance with federal rules and regulations towards improving service quality, service coverage, and service capacity.

Voice Network Upgrades : 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served
Upgrade peds and cabinets	Westphalia (310735)	Jan-15	Dec-19	150
Maintain network to preserve quality of service	Westphalia (310735)	Jan-15	Dec-19	1,100

Broadband Upgrades : 2015

Project Description	Area Served/Wire center	Estimated Start Date	Estimated Completion Date	Estimated Population Served
Upgrade peds and cabinets	Westphalia (310735)	Jan-15	Dec-19	150
Maintain network to preserve quality of service	Westphalia (310735)	Jan-15	Dec-19	1,100

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58 CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Westphalia Telephone Company
Line 112 Update

From Westphalia Telephone Co's Initial 5 Year Plan (filed in June of 2014), the company projects that capital expenditures, by Part 32 accounts for FY2015 through FY2019, related to the above identified projects will be:

	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
2110 Land & General Support	$ -	$ -	$ -	$ -	$ -
2210 Central Office Switching	$ 25,000.00	$ 26,000.00	$ 27,000.00	$ 28,000.00	$ 30,000.00
2230 Central Office Transmission	$ 25,000.00	$ 26,000.00	$ 27,000.00	$ 28,000.00	$ 30,000.00
2410 Cable & Wire Facilities	$ 2,000.00	$ 2,000.00	$ 2,000.00	$ 2,000.00	$ 2,000.00
Total Capital Expenditures	$ 52,000.00	$ 54,000.00	$ 56,000.00	$ 58,000.00	$ 62,000.00

From Westphalia Telephone Co's Initial 5 Year Plan (filed in June of 2014), the company projects that operating expenditures, by Part 32 accounts for FY2015 through FY2019, related to the above identified projects will be:

	FY 2015	FY 2016	FY 2017	FY2018	FY 2019
Plant Specific	$ 381,364.71	$ 392,805.65	$ 404,589.82	$ 416,727.52	$ 429,229.34
Plant Nonspecific	$ 56,240.06	$ 57,927.26	$ 59,665.08	$ 61,455.03	$ 63,298.68
Depreciation	$ 301,222.47	$ 310,259.14	$ 319,566.92	$ 329,153.93	$ 339,028.54
Customer Operations	$ 223,142.29	$ 229,836.56	$ 236,731.66	$ 243,833.61	$ 251,148.61
Corporate Operations	$ 215,889.03	$ 222,365.70	$ 229,036.67	$ 235,907.77	$ 242,985.01
Total Operating Expenses	$1,177,858.56	$ 1,213,194.32	$1,249,590.15	$1,287,077.85	$1,325,690.19

USF Received and Breakout of Use

USF YTD	2015 (1/15 - 6/15)	2016 (7/15 - 6/16)	2017 (7/16 - 6/17)	2018 (7/17 - 6/18)	2019 (7/18 - 6/19)
HCL	$0	$444			
ICLS	$59,790	$134,028			
SNA	$0	$0			
ICC	$111,606	$237,288			
Total USF YTD	$171,396	$371,760			
USF BreakOut					
CapEx USF	$518	$1,125			
OpeEx USF	$170,878	$370,635			

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58 CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Westphalia Telephone Co (310735)

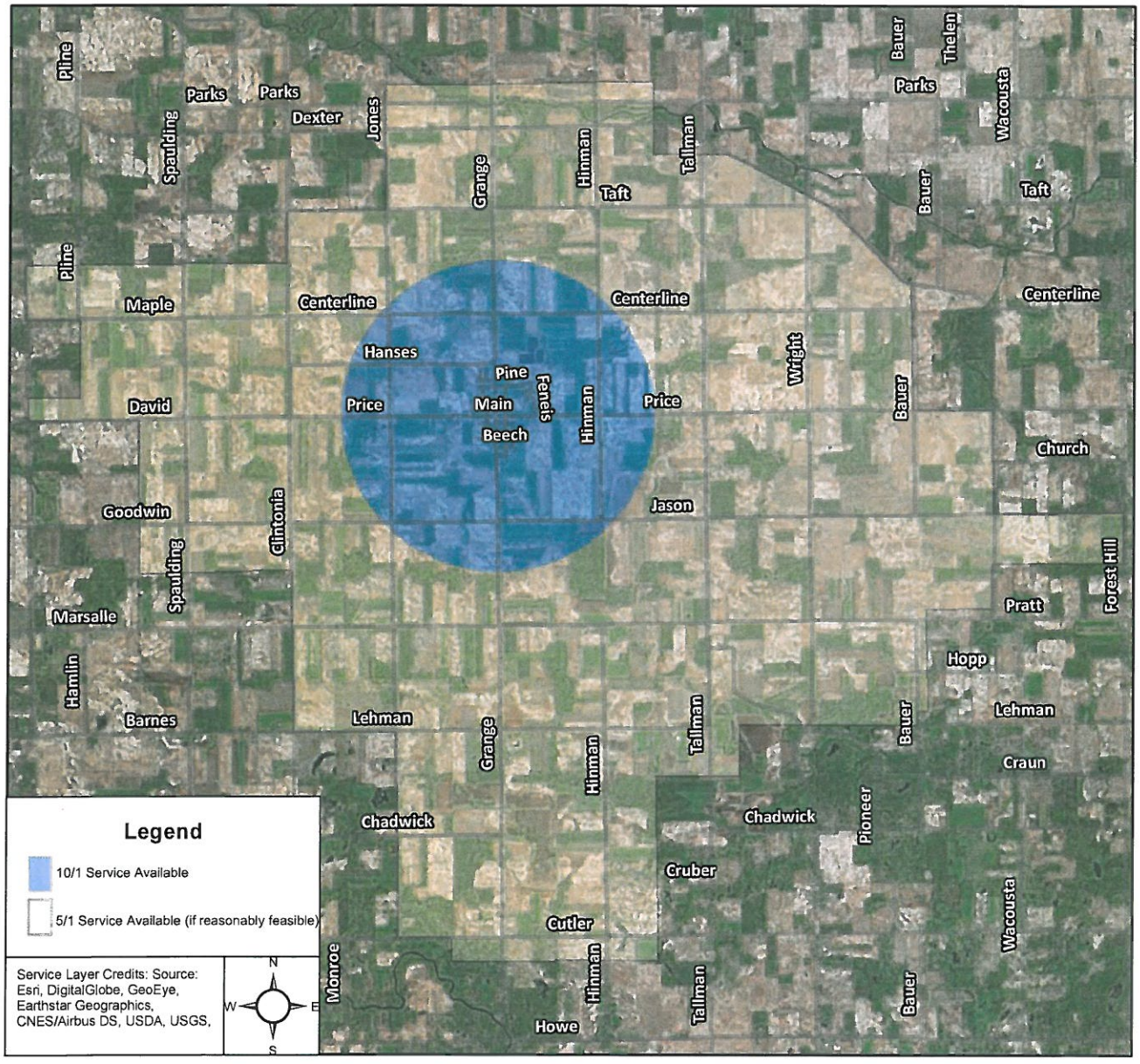
CapEx	2015 (1/15 - 6/15)	2016 (7/15 - 6/16)	2017 (7/16 - 6/17)	2018 (7/17 - 6/18)	2019 (7/18 - 6/19)
2110 Land & General Support	$0	$0	$0	$0	$0
2210 Central Office Switching	$0	$0	$0	$0	$0
2230 Central Office Transmission	$0	$0	$0	$0	$0
2410 Cable & Wire Facilities	$1,649	$6,958	$0	$0	$0
Total Capital Expenditures	$1,649	$6,958	$0	$0	$0
OpEx					
Plant Specific	$150,034	$371,373	$0	$0	$0
Plant Nonspecific	$39,284	$69,551	$0	$0	$0
Depreciation	$121,618	$193,659	$0	$0	$0
Customer Operations	$124,454	$167,393	$0	$0	$0
Corporate Operations	$108,899	$1,489,975	$0	$0	$0
Total Operating Expenses	$544,288	$2,291,951	$0	$0	$0
USF YTD (7/15 - 6/16)					
HCL	$0	$444	TBD	TBD	TBD
ICLS	$59,790	$134,028	TBD	TBD	TBD
SNA	$0	$0	TBD	TBD	TBD
ICC	$111,606	$237,288	TBD	TBD	TBD
Total USF YTD	$171,396	$371,760	TBD	TBD	TBD
USF BreakOut					
CapEx USF	$518	$1,125			
OpeEx USF	$170,878	$370,635			

NOTE: The $1,489,975 in Corporate Operations expenses for 2016 includes approximately $1,100,000 in legal fees that were paid by the parent company of Westphalia Telephone Company. These fees are related to ongoing litigation regarding tandem services provided by Westphalia Telephone Company and it's parent company (Great Lakes Comnet). Westphalia Telephone Company did not pay any cash for the legal services, they were only allocated a portion of the expenses via an intercompany transaction.

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58 CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

Westphalia Telephone Company

10/1 Service and 5/1 Service



Created 6/29/16

Westphalia Telephone Company is a subsidiary of Great Lakes Comnet, Inc. and as such is covered by the CPNI Manual and the Red Flag Manual of Great Lakes Comnet, Inc.

CPNI Manual

CPNI Manual
I. DEFINITIONS
II. STATEMENT OF COPPORATE POLICY
III. USE OF CPNI IN GENERAL
IV. GUIDELINES FOR USE OF CPNI
V. OBTAINING CUSTOMER APPROVAL FOR USE OF CPNI
A. Soliciting Customer Approval
B. Use of Opt-Out and Opt-In Approval Processes
VI. NOTICES REQUIRED FOR USE OF CPNI
A. Mandatory Notices Regarding Solicitation
B. Opt-Out Notice Requirements
D. Opt-In Notice Requirements
E. Notice Requirements Specific to One-Time Use of CPNI
VII. COMPANY SAFEGUARDS AND RECORDKEEPING REQUIREMENTS
A. Management Safeguards
B. Recordkeeping
C. Authentication and Procedural Safeguards
APPENDIX 1: CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES
APPENDIX 2: EMPLOYEE VERIFICATION
APPENDIX 3: SAMPLE OPT-OUT NOTICE

I. DEFINITIONS

***Affiliate**:* A person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. The term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.

Carrier: See Telecommunications Carrier.

CMRS: Commercial Mobile Radio Service.

Communications-Related Services: Telecommunications services, information services typically provided by telecommunications carriers, and services related to the provision or maintenance of customer premises equipment.

Company: Great Lakes Comnet, Inc. or Comlink LLC

Customer: A person or entity to which a telecommunications carrier is currently providing service.

Customer Proprietary Network Information (CPNI): Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information.

Customer Premises Equipment: Equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.

FCC: Federal Communications Commission.

Information Service: The offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications, and includes electronic publishing, but does not include any use of any such capability for the management, control, or operation of a telecommunications system or the management of a telecommunications service.

Information Services Typically Provided by Telecommunications Carriers: Information services that telecommunications carriers typically provide, such as Internet access or voice mail services. The term does not include retail consumer services provided using Internet websites (such as travel reservation services or mortgage lending services), whether or not such services might otherwise be considered to be information services.

Local Exchange Carrier: Any person engaged in the provision of telephone exchange service or exchange access. Such term does not include a person insofar as such person is engaged in the provision of a commercial mobile service (except to the extent that the FCC determines that such service should be included in the definition of the term).

Opt-In Approval: A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that the carrier obtain the customer's affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the carrier's request.

Opt-Out Approval: A method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the prescribed waiting period, after the customer is provided appropriate notification of the carrier's request for consent.

Subscriber List Information: Any information (1) identifying the listed names of a carrier's subscribers and the subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and (2) that the carrier or an affiliate has published, caused to be published, or accepted for publication in any directory format.

Telecommunications Carrier: Any provider of telecommunications services, except that such term does not include aggregators of telecommunications services (as defined in 47 USC 226).

Telecommunications Service: The offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.

II. STATEMENT OF CORPORATE POLICY

The policy of Great Lakes Comnet, Inc. and its wholly owned subsidiary company, Comlink LLC, is to comply with the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's regulations, 47 CFR 64.2001-.2009. The Company's policy is to rely on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

The FCC's regulations, 47 CFR 64.2009, require the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI, and to train its personnel as to when they are, and are not, authorized to use CPNI, and to have an express disciplinary process in place. This Manual constitutes the Company's policies and procedures related to CPNI.

All employees are required to follow the policies and procedures specified in this Manual.

- *Any questions regarding compliance with applicable law and this Manual should be referred to your immediate supervisor.*
- *Any violation of, or departure from, the policies and procedures in this Manual shall be reported immediately to the CEO, COO, or the CFO.*

III. USE OF CPNI IN GENERAL

Except as otherwise described in this Manual, when the Company receives or obtains CPNI by virtue of its provision of a telecommunications service, it can only use, disclose, or permit access to individually identifiable CPNI in its provision of:

1. The telecommunications service from which the information is derived; or

2. Services necessary to, or used in, the provision of the telecommunications service, including the publishing of directories.

IV. GUIDELINES FOR USE OF CPNI

A. The Company may not use, disclose, or permit access to CPNI to market service offerings to a customer that are within a category of service to which the customer does not already subscribe from the Company, unless the Company has customer approval to do so (except that no customer approval is necessary in the situations described in IV.D.).

B. The Company cannot use, disclose or permit access to CPNI to identify or track customers that call competing service providers. Thus, the Company may not use local service CPNI to track all customers that call its local service competitors.

C. The Company may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (i.e., local, interexchange, and CMRS) to which the customer already subscribes from the Company, without customer approval.

1. If the Company provides different categories of service, and a customer subscribes to more than one category of service offered by the Company, the Company may share CPNI among its affiliated entities that provide a service offering to the customer, without customer approval.

2. If the Company provides different categories of service, but a customer does not subscribe to more than one offering by the carrier, the carrier is not permitted to share CPNI with its affiliates, except with the customer's approval as discussed in V., below.D. The Company may use, disclose, or permit access to CPNI, without customer approval, as described below:

1. To provide inside wiring installation, maintenance, and repair services.

2. CMRS providers may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS.

3. To market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and Centrex features.

4. For the provision of customer premises equipment and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

5. To protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

6. Initiate, render, bill and collect for telecommunications services;

7. Provide call location information concerning the user of a commercial mobile service in emergency situations; and

V. OBTAINING CUSTOMER APPROVAL FOR USE OF CPNI

A. Soliciting Customer Approval

The Company may obtain approval through written, oral or electronic methods.

1. 1. If the Company relies on oral approval, it bears the burden of demonstrating that such approval has been given in compliance with the FCC's regulations.
2. 2. A customer's approval or disapproval to use, disclose, or permit access to CPNI must remain in effect until the customer revokes or limits such approval or disapproval.
3. 3. The Company must maintain records of approval, whether oral, written or electronic, for at least one year.

B. Use of Opt-Out and Opt-In Approval Processes

1. The Company may utilize the opt-out or opt-in method to obtain approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer.

2. The Company may also utilize the opt-out or opt-in method to obtain approval to disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents, to its affiliates that provide communications-related services,

and to its joint venture partners and independent contractors.

3. If the Company discloses or provides access to CPNI to a joint venture partner or independent contractor, in addition to obtaining customer approval, it must enter into confidentiality agreements with such contractors or partners. The confidentiality agreement must:

i. Require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which the Company has provided the CPNI;

ii. Disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and

iii. Require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.

VI. NOTICES REQUIRED FOR USE OF CPNI

A. Mandatory Notices Regarding Solicitation

1. Prior to soliciting any customer approval to use, disclose, or permit access to customers' CPNI, the Company must notify the customer of the customer's right to restrict use of, disclosure of, and access to, the customer's CPNI.

2. The Company must maintain records of the notification, whether oral, written or electronic, for at least one year.

3. Content of Notice: Customer notification must provide sufficient information to enable the customer to make an informed decision whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI. The notification must:

i. State that the customer has a right, and the Company has a duty, under federal law, to protect the confidentiality of CPNI.

ii. Specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of the right to disapprove those uses, and deny or withdraw access to CPNI at any time.

iii. Advice the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.iv. Be comprehensible and not misleading

v. State that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.

4. If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

5. If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

6. The Company may state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. The Company also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

7. A carrier may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

8. The Company's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

B. Opt-Out Notice Requirements

The Company must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except for one-time use of CPNI, as discussed in VI.E., below). The contents of any such notification must comply with the requirements of VI.A.3., above.

1. The Company must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The Company may, in its discretion, provide for a longer period. The Company must notify customers as to the applicable waiting period for a response before approval is assumed.

i. In the case of an electronic form of notification, the waiting period begins to run from the date on which the notification was sent.

ii. In the case of notification by mail, the waiting period begins to run on the third day following the date that the notification was mailed.

2. If the Company uses the opt-out mechanism it must provide notices to its customers every two years.

3. Use of E-mail: If the Company uses e-mail to provide opt-out notices, it must comply with the following additional requirements:

i. The Company must have express, verifiable, prior approval from consumers to send notices via e-mail regarding their service in general, or CPNI in particular;

ii. Customers must be able to reply directly to e-mails containing CPNI notices in order to opt-out.

iii. Opt-out e-mail notices that are returned to the Company as undeliverable must be sent to the customer in another form before the Company may consider the customer to have received notice; and

iv. The subject line of the e-mail must clearly and accurately identify the subject matter of the e-mail.

v. The Company must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. The Company may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

D. Opt-In Notice Requirements

The Company may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements described in § VI.A.3., above.

E. Notice Requirements Specific to One-Time Use of CPNI

1. The Company may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether carriers use opt-out or opt-in approval based on the nature of the contact.

2. The contents of any such notification must comply with the requirements of VI.A.3., except that the Company may omit any of the following if not relevant to the limited use for which the carrier seeks CPNI:

i. The Company need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election.

ii. The Company need not advise customers that it may share CPNI with its affiliate(s) or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party.

iii. Carriers need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as carriers explain to customers that the scope of the approval the carrier seeks is limited to one-time use.

iv. Carriers may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as the carrier clearly communicates that the customer can deny access to his CPNI for the call.

F. Except for use and disclosure of CPNI that is permitted without customer approval as discussed above, and except for the purpose of marketing communications-related services to a customer, the Company may only use, disclose, or permit access to a customer's individually identifiable CPNI subject to opt-in approval.

VII. COMPANY SAFEGUARDS AND RECORDKEEPING REQUIREMENTS

A. Management Safeguards

1. Training of Company personnel will include review of this Manual by all new employees and all existing employees who have not previously done so.

2. The Company will provide additional training on an as-needed basis.

3. Company personnel will make no decisions regarding CPNI without first consulting one of the following individuals:

The CEO, COO, or CFO

The Company's personnel must obtain supervisory approval from a person listed above regarding any proposed use of CPNI.

4. In deciding whether the contemplated use of the CPNI is proper, the individual(s) listed in the previous paragraph will consult this manual, applicable FCC regulations or Compliance Guide, and, if necessary, legal counsel.

5. The person(s) listed in VII.A.3. above will personally oversee the use of approval methods and notice requirements for compliance with all legal requirements.

6. The person(s) listed in VII.A.3. above will also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

7. Any improper use of CPNI will result in disciplinary action in accordance with established Company disciplinary policies. Any improper use shall be treated as a serous offense, and may result in suspension or termination of employment in appropriate cases. Any company personnel making improper use of CPNI will undergo additional training to ensure future compliance.

8. The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

i. The notice will be in the form of a letter, and will include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

ii. The Company must submit the notice even if the Company offers other methods by which consumers may opt-out.

9. On an annual basis, a corporate officer of the Company will sign a compliance certificate (Appendix 1) stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's rules.

10. The Company will review these procedures on a continuing basis to ensure compliance with all FCC regulations, and will revise these procedures as needed to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.

B. Recordkeeping

1. The Company will maintain records of its own sales and marketing campaigns that use CPNI in files clearly identified as such. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company will maintain these records in its offices for a minimum of one year.

2. The Company will maintain records of its affiliates' sales and marketing campaigns that use CPNI in files clearly identified as such. These records will include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company will maintain these records in its offices for a minimum of one year.

3. The Company will maintain records of all instances where it disclose or provides CPNI to third parties, or where third parties are allowed access to

CPNI, in files clearly identified as such. These records will include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

4. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

5. The Company will maintain separate files in which it will retain any court orders respecting CPNI.

C. Authentication and Procedural Safeguards

1. Online Access to CPNI. The Company must authenticate Customer without the use of Readily Available Biographical Information or Account Information, prior to allowing the Customer online access to CPNI related to a Telecommunications Service account. Once authenticated, the Customer may only obtain online access to CPNI related to a Telecommunications Service account through a password, as described in Section 10.C.3., that is only prompted by the Company asking for Readily Available Biographical Information, or Account Information.

The Company may choose to block access to a Customer's account after repeated unsuccessful attempts to log into that account.

2. In-Office Access to CPNI. The Company may disclose CPNI (including Call Detail Information) to a Customer who, in the Company's office, first presents a Valid Photo ID matching the Customer's Account Information.

APPENDIX 1: CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

_____ signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of _____ Telephone Company (Company). This Certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR 64.2001-.2009.

On behalf of the Company, I certify as follows:

1. I am the _____ of the Company. My business address is _____.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).

3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with management. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

6. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with management regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

8. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith.

9. The Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

10. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

Date: _____ _____

APPENDIX 2: EMPLOYEE VERIFICATION

Employee Name:

Date:

I have reviewed the Company's Customer Proprietary Network Information
Compliance Manual and Operating Procedures and agree to comply with the procedures set forth therein.

_____

Employee Signature

APPENDIX 3: SAMPLE OPT-OUT NOTICE

_____ Company (Company) utilizes Customer Proprietary Network Information (CPNI) when providing telecommunications products and services to its customers. CPNI is defined as information relating to the quality, technical configuration, destination and amount of use of telecommunications services, including information that may appear on a customer's bill. Information published in the telephone directory is not CPNI.

Under Federal law, telephone companies have a duty to protect this information. As a customer, you have the right at any time to restrict the use of CPNI for marketing purposes. This is considered an "Opt-Out" approach. Your approval to use CPNI may enhance the Company's ability to offer products and services tailored to your needs.

The Company proposes to use your CPNI to [Specify: (1) the information that will be used, (2) the specific entities that will receive the CPNI, (3) the purposes for which CPNI will be used].

If you wish to opt-out, you should take the following steps: [list]

Your decision to opt-out will not affect the provision of any services to which you subscribe. The Company does not and will not sell or offer such information to any third party, except as permitted under Federal Communications Commission regulations. Once you opt-out, you will remain on this list until your request otherwise.

If the Company does not receive an opt-out from you prior to the expiration of the 30-day period following the Company's sending of this notice to you, it will assume that you approve of its proposed use of your CPNI.

GREAT LAKES COMNET

Red Flag and Address Discrepancies

Compliance Manual and Operating Procedures

For

Great Lakes Comnet, Inc and its subsidiary Comlink, LLC

First revised copy issued October 2009
Replaces the October 2008 version
Approved by the Board of Directors on October 15, 2009
Revised on April 14, 2015

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SECTION 1

DEFINITIONS

Account: A continuing relationship established by a person with a Creditor (like the Company) to obtain a product or service for personal, family, household or business purposes, and includes the provision of services on a deferred payment basis.

Annual Report: See Section 9.

Board of Directors: The Company's board of directors, or if the Company does not have a board of directors, a designated employee at the level of senior management.

Covered Account: An Account that the Company offers or maintains primarily for personal, family, or household purposes, that involves or is designed to permit multiple payments or transactions. The term also includes any other Account for which there is a reasonably foreseeable risk to Customers or to the Company of Identity Theft, including financial, operational, compliance, reputation, or litigation risks (See Section 4).

Consumer Report: A written, oral, or other communication of any information by a consumer reporting agency bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used or collected in whole or in part for the purpose of serving as a factor in establishing the consumer's eligibility for credit or insurance to be used primarily for personal, family, or household purposes, employment purposes, or any other purpose authorized under 47 USC 1681 *et seq*.

Credit: The right granted by a Creditor, like the Company, to defer payment of debt or to incur debts and defer its payment or to purchase property or services on a deferred payment basis.

Creditor: A person, like the Company, who regularly extends, renews, or continues Credit, or who regularly arranges for the extension, renewal, or continuation of Credit, or any assignee of an original Creditor who participates in the decision to extend, renew, or continue Credit.

Customer: A person that has a Covered Account with a Creditor or a financial institution.

Identity Theft: A fraud committed or attempted using the Identifying Information of another person without authority.

Identifying Information: A name or number that may be used, alone or in conjunction with any other information, to identify a specific person. The following are examples of Identifying Information:

- Name, Birth Date, Social Security Number, Drivers License or Identification, Alien Registration, Passport Number, Employer or Tax Identification Number;
- Unique Biometric Data, such as a Fingerprint, Voiceprint, Retina or Iris Image, or other Physical Representation;
- Unique Electronic Identification, Address, Routing Code.

Notice of Address Discrepancy: A notice from a consumer reporting agency informing the Company of a substantial difference between the address that the consumer provided and the address in the agency's file for the consumer.

Red Flag: See Section 3.

Readily Available Biographical Information: Information drawn from the Customer's life history and includes such things as the Customer's social security number (or the last four digits), mother's maiden name, home address, or date of birth.

Service Provider: A provider of a service directly to a financial institution or Creditor.

SECTION 2

STATEMENT OF CORPORATE POLICY

The policy of Great Lakes Comnet, Inc. and its subsidiary company Comlink, LLC is to comply with the letter and spirit of all laws of the United States, including those pertaining to Identity Theft contained in the Fair Credit Reporting Act, as amended, 15 USC 1681 *et seq.*, and the Federal Trade Commission's (FTC's) regulations, 16 CFR Part 681. The Company's policy is to protect against the risk of Identity Theft.

The FTC's regulations require the Company to establish a written Identity Theft Prevention Program, and to train its personnel accordingly. This Manual, in conjunction with the Company's Customer Proprietary Network Information (CPNI) Manual, constitutes the Company's written Identity Theft Prevention Program.

All personnel are required to follow the policies and procedures specified in this Manual.

- Any questions regarding compliance with applicable law and this Manual should be referred to Carol Thelen, Director of Compliance at 517-679-7513.

- The following individuals are responsible for oversight of the Company's Identity Theft Prevention Program:
  Carol Thelen, Compliance Director
  Paul Bowman, CEO
  Ryan Thelen, Controller
  John Summersett, COO

- The Company's Board of Directors Approved this first revised Manual on October 15, 2009 and replaces the original manual issued in October 2008.

SECTION 3

WHAT IS A RED FLAG?

A Red Flag is a pattern, practice or specific activity that indicates the possible existence of Identity Theft.

Examples of Red Flags:

- Alerts, notifications, or warnings from consumer reporting agencies, law enforcement, Customers, or victims of Identity Theft.
- Presentation of suspicious documents.
- Unusual use or suspicious activity related to a Covered Account.
- Presentation of suspicious personal identification information.

The purpose of this Manual is to set forth the Company's policies and procedures regarding Red Flags and the prevention and mitigation of Identity Theft.

SECTION 4

IDENTIFICATION OF COVERED ACCOUNTS

The Red Flag rules require the Company to periodically determine whether it offers or maintains Covered Accounts.

The Company will treat all Accounts involving the provision of service on a deferred-payment basis to the public (including residential and business services), as Covered Accounts.

The Company will, on an ongoing basis, determine whether any Accounts that it has not previously treated as Covered Accounts, should be treated as Covered Accounts, taking into consideration:

- The methods of opening Accounts;
- The methods of access to Accounts; and
- Previous experiences with Identity Theft.

SECTION 5

OVERVIEW OF IDENTITY THEFT PREVENTION PROGRAM

The Company endeavors to detect, prevent and mitigate Identity Theft (1) in connection with the opening of a Covered Account, and (2) with respect to existing Covered Accounts.

The Company will—

1. Identify relevant Red Flags for the Covered Accounts that the Company offers or maintains (see Section 6);

2. Detect Red Flags (see Section 6);

3. Take appropriate action to prevent and mitigate any detected Red Flags (see Section 7); and

4. Periodically update this Manual to reflect changes in risks to Customers and to the safety and soundness of the Company from Identity Theft (see Section 8).

SECTION 6

IDENTIFYING RED FLAGS

OPENING OF NEW ACCOUNTS

The Company has determined that a reasonably foreseeable risk of Identity Theft exists when prospective Customers seek to open new Accounts. The Company will therefore use reasonable measures to identify a person or entity that seeks to open a Covered Account.

This Section 6 therefore identifies Red Flags applicable to the opening of new Covered Accounts, and establishes the Company's method of detecting such Red Flags.

The Company will not open a Covered Account or provide any service until it is able to satisfactorily identify the prospective Customer in accordance with this Section 6. If the Company detects a Red Flag during the process of opening a Covered Account, it will place the opening of the Covered Account on hold until it can satisfactorily resolve the Red Flag.

A. Opening of Covered Accounts for Personal, Family or Household Purposes.

1. Required Information: When a prospective Customer seeks to open a Covered Account for residential service (i.e., for personal, family or household purposes), the Company will ask for the following from the prospective Customer:

   - name;
   - address;
   - birth date;
   - an unexpired government-issued identification bearing a photograph, such as a driver's license or passport.

   The Company will also encourage (but not require) Customers to establish passwords as a means of protecting against potential future Identity Theft.

   The Company will encourage Customers who establish passwords not to use Readily Identifiable Biographical Information.

SECTION 6

IDENTIFYING RED FLAGS (CONT'D)

OPENING OF NEW ACCOUNTS (CONT'D)

A. Opening of Accounts for Personal, Family or Household Purposes (Cont'd).

2. Identification Confirmation.

a. The Company will make a photocopy of the prospective Customer's identification, and will inspect the identification for any signs of falsification, such as:

- misspellings;
- a photo that does not resemble the prospective Customer;
- inconsistencies in color, texture or images (such as erasures or smudges);
- raised edges around a photograph indicating the placement of a second photograph over an original photograph;
- card wear inconsistent with date of issuance (such as an identification that appears new but bears an issuance date of many years);

b. Address Discrepancies.

If a prospective Customer provides an address to the Company that does not match the prospective Customer's identification, the Company will verify the validity of the prospective Customer's address. The following are examples of methods that the Company may utilize:

- If the prospective Customer recently moved to the area, the Company will request proof of the recent move.
- The Company may choose to order a Consumer Report with respect to the prospective Consumer as a tool to confirm identity. Before ordering a Consumer Report, the Company will obtain the

prospective Customer's written approval (see Appendix 3). The Company may quiz the prospective Customer regarding non-public information contained therein. The Company may also choose to employ the services of a third-party Identity Theft detection agent.

c. The Company will create a record of the means used to verify a Customer's identity. The Company will retain such record until 5 years after the Account is closed. Upon disposal, the Company will completely destroy the record.

B. Opening of Business Accounts.

For a prospective business Customer, the Company will require documents to verify the existence of the business. Such documents may include:

- Articles of Incorporation or Articles of Limited Liability Company and evidence of filing of same with the Michigan Department of Labor and Economic Growth.
- Partnership agreement.
- Trust instrument.

A sole proprietorship may use an "assumed name" document filed with the Department of Labor and Economic Growth, or the personal information of the sole proprietor.

SECTION 6

IDENTIFYING RED FLAGS (CONT'D)

OPENING OF NEW ACCOUNTS (CONT'D)

C. Examples of Red Flags in the Opening of New Accounts.

1. Suspicious Documents and Personal Identifying Information.

   a. Information on the identification is inconsistent with information provided by the person opening a new Covered Account.

   b. Information on the identification is inconsistent with readily accessible information, such as a signature on a check.

   c. Documentation that appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled.

   d. An address not matching any address in a Consumer Report;

   e. Documents provided for identification appear to have been altered or forged (discussed above).

2. Unusual Use of, or Suspicious Activity Related to, the Covered Account.

   a. A Covered Account is used in a manner inconsistent with established patterns of activity.

   b. Usage of a Covered Account that has been inactive for a reasonably lengthy period of time.

   c. A Customer advises that the Customer is not receiving monthly bills from the Company.

   d. A Customer advises of unauthorized charges or transactions in connection with a Covered Account.

3. The Company receives notice from a Customer, a victim of Identity Theft, law enforcement, or any other person that it may have opened an Account for a person engaged in Identity Theft.

4. If the Company uses a Consumer Report—

   a. The report contains a fraud or active duty alert.

   b. A consumer reporting agency provides a notice of credit freeze in response to a request for a Consumer Report.

   c. A consumer reporting agency provides a Notice of Address Discrepancy.

   d. A Consumer Report indicates a pattern of activity inconsistent with the history and usual pattern of activity of a prospective Customer.

   e. A recent and significant increase in the volume of inquiries.

   f. An unusual number of recently established Credit relationships.

   g. A material change in the use of Credit, especially with respect to recently established Credit relationships.

   h. The social security number is associated with a deceased person.

   If a Consumer Report specifies a telephone number to be used for identity verification purposes, the Company will contact the consumer using the specified telephone number.

SECTION 6

IDENTIFYING RED FLAGS (CONT'D)

PROTECTION OF EXISTING ACCOUNTS

The Company has policies and procedures in place to safeguard customer proprietary network information (CPNI). The Company will continue to utilize its CPNI policies procedures as a safeguard against unauthorized access to Customer CPNI, including pre-texting. Pre-texting is the practice of obtaining call record detail and other CPNI under false pretenses. The Company also monitors suspicious transactions, and verifies change of address requests in accordance with its CPNI Compliance Manual.

The Company updates its Manual to account for changes in law, and it contains all essential information and forms to ensure the Company's compliance with CPNI regulations.

The Company will continue to follow its CPNI Compliance Manual as a means of preventing Identity Theft. The Company will also continue to improve its Identity Theft Prevention Program based on its experience with past incidents of Identity Theft, and new methods of committing Identity Theft of which it becomes aware.

The Company treats the following as Red Flags—

- Alerts, notifications, or other warnings from consumer reporting agencies or Service Providers;
- Suspicious address changes;
- The unusual use of, or other suspicious activity related to, a covered Account; and
- Notice from Customers, victims of Identity Theft, law enforcement authorities, or other persons regarding possible Identity Theft in connection with a Covered Account.

SECTION 7

PREVENTING AND MITIGATING IDENTITY THEFT

The Company will respond appropriately when it detects a Red Flag. In determining how to respond, the Company will consider aggravating factors that may heighten the risk of Identity Theft.

Appropriate responses include one or more of the following depending on the circumstances:

- Monitoring a Covered Account;
- Contacting the Customer;
- Changing passwords or security codes that permit access to a Covered Account;
- Reopening a Covered Account with a new account number;
- Declining to open a Covered Account for a prospective Customer;
- Closing an existing Covered Account
- Not collecting on a Covered Account; or
- Notifying law enforcement (see Section 10 of CPNI Compliance Manual).

SECTION 8

UPDATING THE IDENTITY THEFT PREVENTION PROGRAM

The Company will update this Program periodically to reflect changes in risks to Customers or to the safety and soundness of the Company from Identity Theft.

In updating this Program, the Company will consider the following:

- The Company's experiences with Identity Theft.
- Changes in methods with which Identity Theft is committed.
- Changes in methods to detect, prevent, and mitigate Identity Theft.
- Changes in the types of Accounts that the Company offers or maintains.
- Changes in the Company's business arrangements, such as mergers, acquisitions, alliances, joint ventures, and Service Provider arrangements.

SECTION 9

ANNUAL REPORT

The Company will designate a person to be responsible for preparing an Annual Report to the Board of Directors, appropriate committee of the Board, or a designated senior-level manager.

The Annual Report will address at least the following:

- The effectiveness of the Company's policies and procedures in addressing the risk of Identity Theft in connection with the opening of Covered Accounts.
- The effectiveness of the Company's policies and procedures in addressing the risk of Identity Theft with respect to existing Covered Accounts.
- Arrangements with Service Providers.
- Significant incidents involving Identity Theft and management's response.
- Recommendations for material changes to the Company's Identity Theft Prevention Program.

The Annual Report will be in a format similar to that contained in Appendix 1.

SECTION 10

SERVICE PROVIDERS

To the extent that the Company engages a Service Provider to perform an activity in connection with one or more Covered Accounts, the Company will ensure that the Service Provider has its own Identity Theft Prevention Program to detect and address Red Flags.

The Company is ultimately responsible for complying with Red Flag rules even if it outsources Account-related activity to a Service Provider.

SECTION 11

USE OF CONSUMER REPORTS

To the extent that the Company uses Consumer Reports in the opening of a new Covered Account, it will comply with this Section 11.

If the Company receives a Notice of Address Discrepancy from a consumer reporting agency, the Company must form a reasonable belief that the Consumer Report relates to the prospective Customer about whom it has requested the report.

The Company will do one or more of the following to determine whether it has a reasonable belief that the Consumer Report relates to the prospective Customer about whom it has requested the report:

- Compare the information in the Consumer Report with information the Company uses to verify the prospective Customer's identity.
- Compare the information in the Consumer Report provided by the consumer reporting agency with information the Company obtains from third-party sources.
- Verify with the prospective Customer.

If the Company has reasonably confirmed that an address relates to the prospective Customer about whom it has requested the report, it must furnish the address for the prospective Customer to the consumer reporting agency from whom it received the Notice of Address Discrepancy.

SECTION 12

DISCIPLINARY ACTION

Any failure to follow this Manual will result in appropriate disciplinary action in accordance with established Company disciplinary policies. Such failures shall be treated as a serious offense, and may result in suspension or termination of employment in appropriate cases. The Company will also require additional training to ensure future compliance.

APPENDIX 1

ANNUAL REPORT FORM

To be completed by the Board of Directors, appropriate committee of the Board of Directors, or a designated senior-level manager.

ANNUAL REPORT FOR _____

This Annual Report constitutes _____ Company's (Company) obligation under the Federal Trade Commission's (FTC) regulations and guidelines, 16 CFR Part 681, to produce an Annual Report to address the Company's compliance with the FTC's Red Flag regulations.

1. Effectiveness of Policies and Procedures

a. Opening of Covered Accounts

The Company provides the following report regarding the effectiveness of the Company's policies and procedures in addressing the risk of Identity Theft in connection with the opening of Covered Accounts:

b. Existing Covered Accounts

The Company provides the following report regarding the effectiveness of the Company's policies and procedures in addressing the risk of Identity Theft in connection with existing Covered Accounts:

2. Arrangements with Service Providers

The Company [does/does not] outsource some services to third party Service Providers related to Covered Accounts. [If the Company "does," list them and state:] The Company has taken the following measures to ensure that its Service Provider(s) have Identity Theft Prevention Program(s) to detect and address Red Flags:

3. Significant Incidents Involving Identity Theft

The Company reports the following significant incidents involving Identity Theft and management's response:

4. Recommendations for Material Changes to the Program

The Company should consider the following changes to its Identity Theft Prevention Program.

_____ Title_____
Name

Date: _____

APPENDIX 2

EMPLOYEE VERIFICATION OF RED FLAG COMPLIANCE MANUAL REVIEW

Red Flag
Employee Acknowledgment

Employee Name:_____

I have reviewed the Company's Red Flag and Address Discrepancies Compliance Manual and Operating Procedures and agree to comply with the procedures set forth therein.

_____
Employee Signature

_____
Date

APPENDIX 3

SAMPLE FORM FOR CREDIT REPORT AUTHORIZATION

CREDIT REPORT AUTHORIZATION AND RELEASE

Authorization is hereby granted to _____ (Company) to obtain a standard factual data credit report through a consumer credit reporting agency chosen by Company.

_____ _____
Social Security Number Date of Birth

_____ _____ _____
Last Name First Name M.I.

_____
Street

_____ _____ _____
City State Zip Code

_____
Phone Number

_____ _____
Signature Date

(610) Functionality in Emergency Situations

Carrier is able to remain functional in an emergency situation through the use of back-up power to ensure functionality without an external power source. Carrier has backup battery reserve in its central office, which enables it to provide service for a minimum of eight (8) hours. Carrier's service is consistent with the prior obligations to provide service in emergency situations as set forth in §54.202(a)(2) and Rule 46 of the Michigan Public Service Commission's Service Quality Rules (2000 AC, R 484.546), and its network is engineered to provide maximum capacity in order to handle excess traffic in the event of traffic spikes resulting from emergency situations. Carrier has redundancy in its network for use for use in re-routing traffic when facilities are damaged.

(1010) Descriptive document for Voice Services Rate Comparability

We certify that Westphalia Telephone's rate of $22.82 is not greater than two standard deviations above the national average urban rate for voice service ($47.48).

Westphalia Telephone Company (310735)
Line 3010 – Milestone Certification

General Broadband Requirements

Westphalia Telephone Company (WTC) currently offers broadband service available at rates "reasonably comparable" to offerings of comparable broadband service in urban areas (Par. 91). For example, WTC currently offers 5 mbps downstream with a 1 mbps upstream for $34.95 per month. In the nearest urban area, Lansing Michigan, AT&T offers 6 mbps downstream with no advertised mbps upstream service for $34.95 per month.

Broadband Technical Requirements

WTC has tested their broadband service and determined that the following technical performance characteristics have been measured:

- Minimum actual speeds of 5 mbps downstream and 1 mbps upstream have been achieved at all reasonably feasible customer locations. Actual speed was measured from the end-user interface to the nearest internet access point.
- The time it takes for a packet of data to travel from one point in network to another has been tested to be less than 100 milliseconds. Actual latency was measured from the end-user interface to the nearest internet access point. This latency is suitable for real-time applications, including Voice over Internet Protocol.
- WTC currently has a data usage limit of 250 gigabytes per broadband customer per month; however, this usage limit has never been enforced. WTC does not have the equipment to monitor and impose data usage limits and it does not have any plans to buy any such equipment in the foreseeable future.

Broadband Build-Out Obligations

Upon receipt of a "reasonable request" for service, WTC will deploy services to the requesting customer within a "reasonable time". WTC's goal is to deploy services to a requesting customer in less than a week when it is reasonable. WTC currently deploys "scalable broadband" to their community. Facilities are not always built to meet a single customer request; rather, construction is on a scale which assumes service will be provided ultimately to a broader area surrounding that customer's location.

WTC will continue to assess requests for service for reasonableness and deploy the network in a scalable manner.

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<010>	Study Area Code		<010>	310735	
<015>	Study Area Name		<015>	WESTPHALIA TEL CO	
<020>	Program Year		<020>	2016	
<030>	Contact Name - Person USAC should contact regarding this data		<030>	Tina Wieber	
<035>	Contact Telephone Number - Number of person identified in data line <030>		<035>	9895875008	
<039>	Contact Telephone Email Address - Email Address of person identified in data line <030>		<039>	twieber@4wbi.net	
	☑ Files as reviewed single company			☐ Filed as audited single company	
	☐ Filed as reviewed consolidated company			☐ Filed as audited consolidated company	
	☐ Filed as subsidiary of reviewed consolidated company			☐ Filed as subsidiary of audited consolidated company	

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

Signature | Date

PART A. BALANCE SHEET

	ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD		LIABILTIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS				**CURRENT LIABILITIES**			
1.	Cash and Equivalents	1696741	47983	25.	Accounts Payable	33505	31320
2.	Cash-RUS Construction Fund	0	0	26.	Notes Payable	0	0
3.	Affiliates:			27.	Advance Billings and Payments	340830	15105
	a. Telecom, Accounts Receivable	0	0	28.	Customer Deposits	400	400
	b. Other Accounts Receivable	1917647	0	29.	Current Mat. L/T Debt	0	0
	c. Notes Receivable	0	0	30.	Current Mat. L/T Debt-Rur. Dev.	0	0
4.	Non-Affiliates:			31.	Current Mat.-Capital Leases	0	0
	a. Telecom, Accounts Receivable	84491	1688104	32.	Income Taxes Accrued	0	0
	b. Other Accounts Receivable	0	0	33.	Other Taxes Accrued	0	0
	c. Notes Receivable	0	0	34.	Other Current Liabilities	1508843	48507
5.	Interest and Dividends Receivable	0	0	35.	Total Current Liabilities (25 thru 34)	1883578	95332
6.	Material-Regulated	0	0	**LONG-TERM DEBT**			
7.	Material-Nonregulated	0	0	36.	Funded Debt-RUS Notes	0	0
8.	Prepayments	0	0	37.	Funded Debt-RTB Notes	0	0
9.	Other Current Assets	32457	43597	38.	Funded Debt-FFB Notes	0	0
10.	Total Current Assets (1 Thru 9)	3731336	1779684	39.	Funded Debt-Other	0	0
				40.	Funded Debt-Rural Develop. Loan	0	0
NONCURRENT ASSETS				41.	Premium (Discount) on L/T Debt	0	0
11.	Investment in Affiliated Companies			42.	Reacquired Debt	0	0
	a. Rural Development	0	0	43.	Obligations Under Capital Lease	0	0
	b. Nonrural Development	0	0	44.	Adv. From Affiliated Companies	0	1072741
12.	Other Investments			45.	Other Long-Term Debt	0	0
	a. Rural Development	0	0	46.	Total Long-Term Debt (36 thru 45)	0	1072741
	b. Nonrural Development	0	0	**OTHER LIAB. & DEF. CREDITS**			
13.	Nonregulated Investments	0	0	47.	Other Long-Term Liabilities	268149	268149
14.	Other Noncurrent Assets	0	0	48.	Other Deferred Credits	0	0
15.	Deferred Charges	0	0	49.	Other Jurisdictional Differences	0	0
16.	Jurisdictional Differences	0	0	50.	Total Other Liabilities and Deferred Credits (47 thru 49)	268149	268149
17.	Total Noncurrent Assets (11 thru 16)	0	0	**EQUITY**			
				51.	Cap. Stock Outstanding & Subscribed	6564	6564
PLANT, PROPERTY, AND EQUIPMENT				52.	Additional Paid-in-Capital	0	0
18.	Telecom, Plant-in-Service	4589998	4598606	53.	Treasury Stock	0	0
19.	Property Held for Future Use	0	0	54.	Membership and Cap. Certificates	0	0
20.	Plant Under Construction	0	0	55.	Other Capital	0	0
21.	Plant Adj., Nonop. Plant & Goodwill	0	0	56.	Patronage Capital Credits	0	0
22.	Less Accumulated Depreciation	-3490801	-3748817	57.	Retained Earnings or Margins	2672242	1186687
23.	Net Plant (18 thru 21 less 22)	1099197	849789	58.	Total Equity (51 thru 57)	2678806	1193251
24.	**TOTAL ASSETS (10+17+23)**	4830533	2629473	**59.**	**TOTAL LIABILITIES AND EQUITY (35+46+50+58)**	4830533	2629473

(3005b) Operating Report for Privately-Held Rate of Return Carriers
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<015>	Study Area Name	<015> WESTPHALIA TEL CO
<020>	Program Year	<020> 2016
<030>	Contact Name - Person USAC should contact regarding this data	<030> Tina Wieber
<035>	Contact Telephone Number - Number of person identified in data line <030>	<035> 9895875008
<039>	Contact Telephone Email Address - Email Address of person identified in data line <030>	<039> twieber@4wbi.net

PART B. STATEMENTS OF INCOME AND RETAINED EARINGS OR MARGINS			
	ITEM	PRIOR YEAR	THIS YEAR
1.	Local Network Services Revenues	285819	263054
2.	Network Access Services Revenues	1030140	1006799
3.	Long Distance Network Services Revenues	0	0
4.	Carrier Billing and Collection Revenues	1674	260
5.	Miscellaneous Revenues	166184	116824
6.	Uncollectible Revenues	1000	336938
7.	**Net Operating Revenues (1 thru 5 less 6)**	1482817	1049999
8.	Plant Specific Operations Expense	356985	425949
9.	Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	86350	90580
10.	Depreciation Expense	283240	258016
11.	Amortization Expense	0	0
12.	Customer Operations Expense	288605	272558
13.	Corporate Operations Expense	265208	1460047
14.	**Total Operating Expenses (8 thru 13)**	1280388	2507150
15.	Operating Income or Margins (7 less 14)	202429	-1457151
16.	Other Operating Income and Expenses	0	0
17.	State and Local Taxes	20768	0
18.	Federal Income Taxes	50610	0
19.	Other Taxes	28959	28117
20.	Total Operating Taxes (17+18+19)	100337	28117
21.	Net Operating Income or Margins (15+16-20)	102092	-1485268
22.	Interest on Funded Debt	0	0
23.	Interest Expense - Capital Leases	0	0
24.	Other Interest Expense	3703	1278
25.	Allowance for Funds Used During Construction	0	0
26.	Total Fixed Charges (22+23+24-25)	3703	1278
27.	Nonoperating Net Income	1273	985
28.	Extraordinary Items	0	0
29.	Jurisdictional Differences	0	0
30.	Nonregulated Net Income	0	0
31.	Total Net Income or margins (21+27+28+29+30-26)	99662	-1485561
32.	Total Taxes Based on Income	50610	0
33.	Retained Earnings or Margins Beginning-of-Year	2572580	2672242
34.	Miscellaneous Credits Year-to-Date	0	0
35.	Dividends Declared (Common)	0	0
36.	Dividends Declared (Preferred)	0	0
37.	Other Debits Year-to-Date	0	0
38.	Transfers to Patronage Capital	0	0
39.	Retained Earnings or Margins end-of-Period [(31+33+34)-(35+36+37+38)]	2672242	1186681
40.	Patronage Capital Beginning-of-Year	0	0
41.	Transfers to Patronage Capital	0	0
42.	Patronage Capital Credits Retired	0	0
43.	Patronage Capital End-of-Year (40+41-42)	0	0
44.	Annual Debt Service Payments	0	0
45.	Cash Ratio [(14+20-10-11)/7]	0.74	2.17
46.	Operating Accrual Ratio [(14+20+26)/7]	0.93	2.42
47.	TIER [(31+26)/26]	27.91	-1161.41
48.	DSCR [(31+26+10+11)/44]	0.00	0.00

(3005c) Operating Report for Privately-Held Rate of Return Carriers
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	PART C. STATEMENTS OF CASH FLOWS	
1.	**Beginning Cash (Cash and Equivalents plus RUS Construction Fund)**	1696741
	CASH FLOWS FROM OPERATING ACTIVITIES	
2.	**Net Income**	-1485561
	Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3.	Add: Depreciation	258016
4.	Add: Amortization	0
5.	Other (Explain)	0
	Changes in Operating Assets and Liabilities	
6.	Decrease/(Increase) in Accounts Receivable	314034
7.	Decrease/(Increase) in Materials and Inventory	0
8.	Decrease/(Increase) in Prepayments and Deferred Charges	0
9.	Decrease/(Increase) in Other Current Assets	-11140
10.	Increase/(Decrease) in Accounts Payable	-2185
11.	Increase/(Decrease) in Advance Billings & Payments	-325725
12.	Increase/(Decrease) in Other Current Liabilities	-1460336
13.	**Net Cash Provided/(Used) by Operations**	-2712897
	CASH FLOWS FROM FINANCING ACTIVITIES	
14.	Decrease/(Increase) in Notes Receivable	0
15.	Increase/(Decrease) in Notes Payable	1072741
16.	Increase/(Decrease) in Customer Deposits	0
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	0
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	0
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	0
20.	Less: Payment of Dividends	0
21.	Less: Patronage Capital Credits Retired	0
22.	Other (Explain)	0
23.	**Net Cash Provided/(Used) by Financing Activities**	1072741
	CASH FLOWS FROM INVESTING ACTIVITIES	
24.	Net Capital Expenditures (Property, Plant & Equipment)	-8602
25.	Other Long-Term Investments	0
26.	Other Noncurrent Assets & Jurisdictional Differences	0
27.	Other (Explain)	0
28.	**Net Cash Provided/(Used) by Investing Activities**	-8602
29.	**Net Increase/(Decrease) in Cash**	-1648758
30.	**Ending Cash**	47983